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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

17 HYPERMEDIA NAVIGATION LLC,
18 Plaintiff,
19 v.
20 GOOGLE LLC,
21 Defendant.

Case No. 4:18-cv-06137-HSG

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEADLINE FOR
PLAINTIFF TO FILE ANY FURTHER
AMENDED COMPLAINT**

23 Under the Court's Order Granting Defendant Google LLC's ("Google") Motion to Dismiss
24 Claims for Induced and Willful Infringement (ECF No. 47), Plaintiff Hypermedia Navigation LLC
25 ("Hypermedia") must file any further amended complaint on or before **April 30, 2019**. The parties
26 by stipulation agreed to extend the deadline to **May 20, 2019**. ECF Nos. 48, 49.

27
28 STIPULATION AND ~~PROPOSED~~ ORDER
TO EXTEND DEADLINE
NO. 4:18-CV-06137-HSG

1 Hypermedia requests and Google agreed to an additional four-week extension of the
2 deadline for Hypermedia's Second Amended Complaint to **June 17, 2019**.

3 On April 12, 2019, Hypermedia served discovery requests seeking information regarding
4 Google's pre-suit communications with non-party Yahoo!. Google provided responses on May 13,
5 2019, but the parties are currently discussing the necessity and scope of any deposition(s) related
6 to the same issues.

7 Hypermedia makes this additional request for extension to allow the Parties to resolve the
8 deposition issues, which both parties agree would promote efficiency.

9 The requested additional four-week extension of this deadline would not alter the schedule
10 for the rest of the case or any additional deadlines in the case schedule.

11 The parties therefore respectfully request that the Court modify the schedule to change the
12 deadline for Hypermedia to file a Second Amended Complaint to **June 17, 2019**.

1
2 Dated: May 20, 2019
3

Respectfully submitted,

NI, WANG & MASSAND, PLLC

4
5 By: /s/ Hao Ni
Hao Ni

6 Attorney for Plaintiff
7 HYPERMEDIA NAVIGATION LLC

8 Dated: May 20, 2019

O'MELVENY & MYERS LLP

9
10 /s/ Mark Liang
11 Mark Liang

12 Attorneys for Defendant
13 GOOGLE LLC

14 **FILER'S ATTESTATION**


15 I certify that all counsel of record is being served on December 19, 2018, with a copy of
16 this document via the Court's CM/ECF system. Dated: May 20, 2019

17 /s/ Hao Ni
18 Hao Ni

ORDER

PURSUANT TO THE MOTION, IT IS SO ORDERED. Plaintiff's deadline to file a further Amended Complaint is extended to June 17, 2019

DATED: 5/21/2019


The Honorable Haywood S. Gilliam, Jr.
United States District Judge